

CSM Legal, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

February 3, 2022

Via ECF

Honorable Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Macas et al v. K.Y. Young Inc. et al,
Index No. 21-cv-3244 (LJL)

Dear Judge Liman:

This office represents Plaintiffs in the above matter. We write with the consent of with the Defendants to respectfully request a 60-day extension of the discovery schedule, currently set to end on February 4, 2022.

The reason for this request is that this office has lost contact with one Plaintiff, Maria Jerez, and has had to move to withdraw from representing her. (See Docket No. 30). The Court has since ordered Ms. Jerez to show cause as to why her claims should not be dismissed for failure to prosecute. (Docket No. 31).

As Ms. Jerez has been unresponsive to discovery requests to date, the parties have been unable to complete written discovery and, as such, unable to schedule depositions. Should the case proceed with only Plaintiff Mayra Macas, the parties are confident that they should be able to complete discovery, including depositions, within a 60-day time period.

As noted previously, the parties feel that being allowed to complete outstanding discovery, which currently includes the supplementation of the Defendants' responses to the Plaintiffs' First set of Document Requests and the depositions of the parties, will facilitate settlement talks and ideally lead to the amicable resolution of the matter.

This is the second request of its nature

The parties thank the Court for its consideration of this matter.

Respectfully Submitted,

/s/ Clela Errington
Clela A. Errington, Esq.

cc: Defendants, via ECF